

RECEIVED
FEDERAL ELECTION
COMMISSION

To: Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

2017 SEP 21 AM 7:11

From: Peter A. Reese

OFFICE OF GENERAL
COUNSEL

Buffalo, New York 14214

MUR # 7277

Subject: Complaint Against Buffalo for Bernie Sanders, C00609602

Date: September 13, 2017

Dear Sirs:

During the course of the most recent Presidential Primary Election in New York, my wife, Ellen Reese, and I made several monetary contributions to the organization titled "Buffalo for Bernie Sanders," a purported political committee. In particular, three such contributions were made by way of checks drawn on our joint bank account and my legal operating account, totaling \$750. Copies of these three checks are attached to and made part of this complaint by reference.

From documents filed with the Federal Election Commission, it appears that only one Form 3X containing itemized data was ever filed by the committee on April 15, 2016. That report does not contain any itemized report of our checks having been received. It also appears that three separate bank accounts were used to deposit these checks and we are not sure if any of our money was ever received and used for its intended purpose, the support of the candidacy of Senator Bernie Sanders running for President. This failure to report and account for campaign contributions was brought to the attention of Treasurer, Brian Nowak, on or about August 17, 2016, and he has failed to make any corrections. See attached New York State of Politics posting.

I hereby request an investigation of this matter by the Commission and that appropriate corrective actions be undertaken.

VERIFICATION:

STATE OF NEW YORK)
COUNTY OF ERIE) SS.:
CITY OF BUFFALO)

PETER A. REESE, being duly sworn, deposes and states that he is the Complainant in this proceeding; that he has read the foregoing Complaint and knows the contents thereof; that the same are true to the knowledge of deponent, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, he believes them to be true.



PETER A. REESE

SWORN TO BEFORE ME
THIS 13th DAY OF September, 2017



ELLEN REESE
Notary Public, State of New York
Qualified in Erie County
My Commission Expires March 30, 2019

Joint: Account Activity Transaction Details

My Description: Buffalo for Bernie

Check number: 00000000916

Post date: 09/15/2015

Amount: -450.00

Type: Check

Description: Check

100044440001

| | | |
|-------------------------------|--------------------|----------------------|
| PETER A REESE ELLEN REESE | | 916 |
| BUFFALO NY 14214 | | 1 30/110 BY 12772 |
| Sept 13 2015 | | |
| Pay To The Order Of | Buffalo for Bernie | \$450.00 |
| Four Hundred fifty and no/100 | | 0 2 |
| Bank of America | | |
| ACH NY 021000020 | | |
| For | Ellen Reese | |

100044440001

| | |
|-------------|--|
| ACCT 0 1000 | |
|-------------|--|

Regular Checking - : Account Activity Transaction Details

My Description: Buffalo for Bernie

Check number: 00000000234

Post date: 10/14/2015

Amount: -200.00

Type: Check

Description: Check


PETER A. REESE
ATTORNEY
BUFFALO, NY 14214

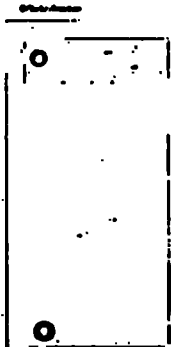
Date 10/14/15 234
10/14/15 NY
13327

Pay to the Order of Buffalo for Bernie \$ 200.00
Two Hundred and 00/100 Dollars

Bank of America

ACH AUT 101000000

For Condy's 



Joint: Account Activity Transaction Details

My Description: Buffalo for Bernie

Check number: 00000000976

Post date: 03/08/2016

Amount: -100.00

Type: Check

Description: Check

PETER A REESE
ELLEN REESE
BUFFALO NY 14214

976
1-32/210 NY
18713

Mar. 5, 2016
DATE

Pay To The
Order Of Buffalo for Bernie \$ 100.00
One hundred and 00/100 DOLLARS

Bank of America

ACH NY 021000223

For _____ Ellen Reese

<http://www.nystateofpolitics.com/2016/08/another-controversy-in-the-erie-county-district-attorney-race/>

Another Controversy In The Erie County District Attorney Race

From the Morning Memo:

Erie County District Attorney candidate Mark Sacha wants to know who paid for a poll released by one of his primary opponents last week, and how much it cost.

Sacha's campaign manager, Brian Nowak, has submitted a letter to the Erie County Board of Elections, asking the commissioners to investigate whether acting DA Michael Flaherty's poll was correctly filed.

It was not included in Flaherty's 32 day pre-primary report, posted Tuesday. The campaign said it will be part of the next filing.

"The cost did not appear on the previous filing because the campaign had not yet been billed," spokesperson Maggie McKeon said.

This is just the latest controversy surrounding the poll, which indicated the acting DA held a commanding lead over Sacha and the party's preferred candidate, John Flynn. Both of Flaherty's opponents called it a push poll and questioned the manner in which the results were disclosed.

"It's not the intention to accuse any wrongdoing based on our review of their filings, but it is important that all campaigns file complete and accurate campaign finance reports," Nowak wrote in his letter.

Meanwhile, a major Flaherty donor said it's Nowak's campaign finances that should be scrutinized, not the poll. Sacha's campaign manager was also an organizer for Buffalo for Bernie.

Western New York attorney Peter Reese reached out to me Tuesday evening with an email entitled "Sacha Whining." He attached three checks he and his wife wrote to Buffalo for Bernie that don't appear to have been properly documented under Federal Elections Commission rules.

Nowak said he had no desire to get in a back and forth and chose not to comment. But with just one month left before the September primary, it will be interesting to see if the campaigns continue to attack each other.